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James H. Power
Marie E. Larsen
HOLLAND & KNIGHT LLP
31 West 52nd Street
New York, New York 10019
Telephone: 212-513-3200
Telefax: 212-385-9010
Email: james.power@hklaw.com
marie.larsen@hklaw.com

Attorneys for Plaintiff
Fujian Ocean Shipping Co. Ltd.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FUJIAN OCEAN SHIPPING CO. LTD.,
individually and on behalf of
M/V ZHENG RUN (IMO No. 9593816), and
M/V ZHENG RONG (IMO No. 9593828)

15 Civ. _____ ()

Plaintiff,

- against -

O.W. BUNKER FAR EAST (S) PTE. LTD.,
EQUATORIAL MARINE FUEL MANAGEMENT
SERVICES PTE LTD, SINANJU MARINE
SERVICES PTE LTD, GLOBAL MARINE
TRANSPORTATION PTE LTD, GLOBAL ENERGY
TRADING PTE LTD and ING BANK N.V.

Defendants.

APPLICATION FOR PRELIMINARY INJUNCTION
PURSUANT TO FED. R. CIV. P. 65

Fujian Ocean Shipping Co. Ltd. ("FOSCO"), individually and on behalf of M/V Zheng Run and M/V Zheng Rong (the "Vessels"), hereby makes an application pursuant to Federal Rule of Civil Procedure 65 for a preliminary injunction in the form of an order restraining all claimants from instituting any proceeding in any State or United States court in any way relating

to or affecting the disputed funds corresponding to the fuel delivery to the Vessels described in the Complaint and which have been deposited in the Court's registry, until further order of the Court. Moreover, by this application, FOSCO seeks to restrain all claimants and other parties from (i) arresting or attaching the Vessels pursuant to Fed. R. Civ. P. Supplemental Admiralty Rule C or Rule B or other law, anywhere in the world based on claims for payment or security for payment for the fuel delivery; and (ii) instituting or prosecuting any proceeding against FOSCO *in personam* based on a claim related to the subject matter of the action set forth in the Complaint herein.

The grounds for this application are set forth in the accompanying memorandum of law, which is incorporated herein by reference.

Dated: New York, New York
January 19, 2016

HOLLAND & KNIGHT LLP

By: 
James H. Power
Marie E. Larsen
31 West 52nd Street
New York, New York 10019
Telephone: 212-513-3200
Telefax: 212-385-9010
Email: james.power@hklaw.com
marie.larsen@hklaw.com

*Attorneys for Plaintiff Fujian Ocean Shipping
Co. Ltd., individually and on behalf of
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M/V Zheng Rong (IMO No. 9593828)*